



CRNA GORA

MINISTARSTVO ODRŽIVOG RAZVOJA
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INCEPTION REPORT
For the
UNEP/GEF Enabling Activity titled “Review and update of the national implementation
plan for the Stockholm Convention on Persistent Organic pollutants (POPs) in
Montenegro”

November, 2016.

Introduction

The Ministry of Sustainable Development and Tourism together with United Nations Environment Programme and Center for ecotoxicological research is implementing the project “Review and update of the national implementation plan for the Stockholm Convention on Persistent Organic pollutants (POPs) in Montenegro”. The main objective of the project is to update the inventory of old POPs chemicals and develop inventory for new POPs chemicals together with action plans for reducing/eliminating risk and exposure to POPs and raising awareness of all target groups about the risks of exposure to POPs and measures to reduce this risk. The project is financed by the Global Environment Fund (GEF) as an Enabling Activities in the amount of 200,000 USD, and is planned to last 24 months, ie. until September of 2018.

Center for ecotoxicological research – Podgorica LLC (CETI) has signed a Small Scale Funding Agreement with United Nations Environment Programme Regional Office for Europe (UNEP) for the execution of the project “Review and update of the national implementation plan for the Stockholm Convention on Persistent Organic pollutants (POPs) in Montenegro”.

The general objective of the assignment is implementation of Component II – Assessment of the national infrastructure and capacity for all POPs and development of new POPs inventories and updating for the initial POPs and Component III- Development or updating of Action plan to address POPs issues and meeting Convention requirements for the UNEP/GEF EA “Review and update of the national implementation plan for the Stockholm Convention on Persistent Organic pollutants (POPs) in Montenegro” in 2016.

The specific objectives of this assignment are to gather comprehensive information on current POPs management practices, POPs use and their impacts to human health and the environment, which will enable a better understanding and sound planning on POPs management.

Activity or activities to be carried out with the support of the small-scale funding:

- Assess national regulatory and institutional framework for POPs management
- Draft outline for an inventory of the original twelve and ten new POPs
- Develop outline for assessment of impacts of POPs to human health and the environment
- Develop work plan for revision of the existing National Action Plans on POPs

Expected results/outputs to be achieved:

- Draft overview of national infrastructure and regulatory framework is developed
- Outline of POPs inventory is prepared
- Draft outline for assessment of POPs risk management and impacts has been made
- Draft work plan for revision of the existing National Action Plans on POPs has been made

I) The implementation of project activities has started on 26-27. of September with Kick off Meeting and Inception Workshop.

The invitation to participate in the Inception Workshop was given to representatives of the following institutions:

- Biotechnical Faculty - University of Montenegro
- The Ministry of Health
- Ministry of Interior - Directorate for Emergency situation
- CGES AD Podgorica
- CEDIS
- KAP (Aluminium Factory- Podgorica)
- Customs Administration
- MONSTAT (Statistical office of Montenegro)
- Hemosan
- Inspection Directorate
- CETI
- Environmental Protection Agency
- Chamber of Commerce
- Hemofarm
- NGO Ozon

Representatives of Customs Administration, MONSTAT and NGO Ozon were not present at the meeting because of legitimate reasons.

Kick off meeting and inception workshop was opened by *Ms. Ivana Vojinovic*, general director of Directorate for environment, *Ms. Nada Medenica* executive director of CETI and *Mr. Pier Carlo Sandei* program manager of project at UNEP office in Vienna.

There are no POPs pesticides in Montenegro because we banned import, production and transit through our country”, said Ivana Vojinovic, general director of Directorate for environment. She expressed her full confidence in future work of CETI as a partner in this project.

“In order to accomplish main objective of this project, we will gather all available information about current situation regarding management of POPs, as well as information about their impact on environment and human health. This is a complex project and quality cooperation is crucial for the implementation and quality of project results. The result of this workshop should be very concrete – we will determine methodology for work in the future, form working groups and working plan for update of POPs inventory”, said Nada Medenica executive director of CETI.

Pier Carlo Sandei, program manager of project at UNEP office in Vienna, thanked CETI for quick and positive reaction regarding partnership in the project, and Ministry for sustainable development and tourism for their assistance on the project, as well as colleagues from Serbia that came to share their experience in this project.

“Our role here is to help as much as possible and to try to answer to all requests from CETI and Ministry and other working groups in order to make a quality document”, said Sandei.

The Inception Workshop began with a presentation of representatives of UNEP (*Ms. Sonja Malicevic*). Ms. Malicevic introduced the participants with information on how the project is organized, how long it takes, reporting, what are the key activities / components and what are the expected results (Annex 1).

Representatives of MORT and CETI (*Ms. Jelena Kovacevic and Ms. Danijela Sukovic*) introduced the participants with the basic obligations under the Stockholm Convention, the regulatory authorities in Montenegro for the management of POPs, legislative acts in force in relation to POPs and basic information about the new POPs. Also, participants were introduced to the project plan, the method of selecting the participants for the workshop and who are the key stakeholders.

Mr. Dejan Jancic (CETI representative) introduced the participants about all the new POPs, their chemical structure, use, toxicity and alternative.

Participants were informed by *Mr. Ivan Djurickovic* (National Focal Point for Stockholm Convention and the Head of Project team for the revision of NIP in Republic of Serbia, Department for Chemicals, Ministry of Agriculture and Environmental Protection) and *Ms. PhD Hristina Stevanovic Carapina*, (NIP revision project coordinator for implementation of the Stockholm Convention in Republic of Serbia) on the legislation of the Republic of Serbia, as well as project updates NIP implemented, the methodology they used, the problems they encountered during the inventory of new POPs and how they solved these problems. Special attention was paid to PBDEs and transport sector and e-waste inventory methodologies and PFOS inventory methodology. The presentations were very useful and the participants had a number of questions how to solve problems during the inventory.

The second day began with a presentation: “Socio-economic and gender analysis - methodology which will be applied in the project realization” which was presented by *Mr. Filip Nikcevic* (CETI). Mr. Nikcevic explained the importance of the social component in monitoring all phases of project implementation, as well as provided Draft guidance on socio-economic assessment for national implementation plan development and implementation under the Stockholm Convention.

After the presentation, the plenary has divided in four separate Working Groups as follows:

1. POPs pesticides inventory
2. PCB inventory
3. Un POPs inventory
4. Chemicals inventory (PBDEs and PFOS)

The division of the participants of the workshop to the Working Group was made in the following way:

1. POPs pesticides inventory

1. Professor Nedeljko Latinovic- Biotechnical Faculty -leader of the working group
2. Milka Petrusic -Head of the Department of plant protection and plant nutrition and plant health information system in the Administration for food safety, veterinary and phytosanitary matters
3. Milica Dasic - Ministry of health
4. Bojan Beljkas – CETI

2. **PCB inventory**

1. Milan Marjanovic- CEDIS - leader of the working group
2. Marijana Kaludjerovic – Aluminum Factory-Podgorica
3. Danijela Djuranovic- Hemosan

3. **UnPOPs inventory**

1. Nebojsa Jablan- EPCG-leader of the working group
2. Irena Tadic- EPA

4. **Chemicals inventory (PBDEs and PFOS)**

1. Danijela Sukovic- CETI -leader of the working group
2. Tatjana Djokovic-EPA
3. Tatjana Mujicic-EPA
4. Olivera Janjic-Hemofarm
5. Nada Marstijepovic-Ministry Interior
6. Veselinka Zarubica- Inspection Directorate
7. Dejan Jancic – CETI
8. Vladimir Zivkovic –CETI
9. Dragan Gazivoda- CETI

All members of the working groups were introduced by Ms. Danijela Sukovic with the web site of the Stockholm Convention and the necessary documentation to be kept in mind when NIP is updated:

Guidance for NIP development and update

- Guidance for Developing a National Implementation Plan for the Stockholm Convention on Persistent Organic Pollutants
- Draft guidance on calculation of action plan costs for specific POPs
- Draft guidance on Socio-Economic Assessment for National Implementation Plan Development and Implementation under the Stockholm Convention

- Draft guidance for the inventory of perfluorooctane sulfonic acid (PFOS) and related chemicals listed under the Stockholm Convention on POPs
- Draft guidance on best available techniques and best environmental practices for the use of perfluorooctane sulfonic acid (PFOS) and related chemicals
- Draft guidance for the inventory of polybrominated diphenyl ethers (PBDEs) listed under the Stockholm Convention on POPs
- Draft guidance on best available techniques and best environmental practices for the recycling and waste disposal of articles containing polybrominated diphenyl ethers (PBDEs) listed under the Stockholm Convention on POPs
- Draft guidance for the control of the import and export of POPs
- Labelling of products or articles that contain POPs-initial considerations
- Draft guidance on sampling, screening and analysis of persistent organic pollutants in products and articles (2013)
- Guidance for the inventory, identification and substitution of Hexabromocyclododecane (HBCD) (draft, April 2015)

Other available resources

- Step-by-step companion guide to the review and updating of the National Implementation Plans – 2011
- Lessons learned and good practices in the development of national implementation plans for the Stockholm Convention on Persistent Organic Pollutants, 2006
- New POPs – Publications
- PCBs – Guidance documents on PCBs
- BAT/BEP – Guidelines on best available techniques and provisional guidance on best environmental practices
- Toolkit – Standardized toolkit for Identification and Quantification of Dioxins and Furan Releases
- Waste and Stockpiles
 - Training tool
 - POPs Waste
 - E-Waste
 - Technical guidelines adopted under Basel Convention

These are actually guidelines to be followed in the preparation of the work plan. After two hours of work in the working groups, representatives of the working groups presented their work plan, which is presented below in four separate sections (based on four working groups).

POPs PESTICIDES INVENTORY

Montenegro does not produce pesticides, but the overall need for them is imported. Activities on this project will be focused on the overview of imported pesticides, their distribution and inventory.

In order to assess the situation in the field of POPs pesticides it is necessary to undertake the following activities:

- Inspect agricultural cooperatives which have in the meantime closed, as well as those that still operate (questionnaires and field visit).
- This is particularly important due to the use of endosulfan, which is the last plant protection product from the chemical group of organochlorine compounds.
- Inspection of Wood industry (field visits and questionnaires to be sent out to the warehouse of chemicals used for treating timber and logs).
- Control of Wood industry (sawmills, furniture factories), especially due to the use of lindane, which is used for the treatment of logs and timber.
- Inspection of agricultural pharmacies that operated before 2006, as there is certain sales data on lindane and endosulfan (field visits and questionnaires). If we receive information that there was some stock left or that the chemicals were sold to someone, we should then follow the indicated path to acquire information about the existence of chemicals.
- Contact Hemosan from Bar to collect the data if they have since their foundation of the company until now had any requests for destruction, transport or other regarding organochlorine pesticides.
- Collect data on import of endosulfan as a biocide since 2008. (it was allowed to import endosulfan as a biocide in the period after 2008)
- Inquire were there any problems due to natural disasters (floods, etc.) - Ask the Sector for Emergency Situations whether there were storage units of pesticides in disaster-affected areas.
- Interview the DDD (Disinfection, Disinsection, Deratisation) Service about the pesticide product used in the past (this is important because endosulfan were used before as a biocide).
- Search for data from Institute for Public Health (IPH) and CETI on the analysis of residues of organochlorine pesticides in water, soil, etc.

Questionnaires should be directed to:

- Agricultural cooperatives (which are closed and working)
- Wood industry,
- Agricultural pharmacies (especially that operated prior to 2006)
- DDD services
- Sector for emergency situations (whether they are extinguished or had a flooded warehouse with hazardous chemicals)

Questionnaires to Agricultural cooperatives

1. Status of work: yes/ no
2. Do you have a warehouse for plant protection products?
3. From which year you keep records of stored pesticides?
4. Can you provide us the names of the chemicals you store in your warehouse?
5. Do you use organochlorine pesticide?

6. Do you use DDT, endrin, toxaphene, aldrin, dieldrin, lindane, endosulfan, and other?
7. If you have used them, note until when or if you use them now, note in what quantities (applies to both previous and current use)

Questionnaires to Wood industry

1. Status of work: yes / no
2. Do you use products with the POPs for coating / treatment of wood?
3. Do you have a warehouse for products for coating / treatment of wood?
4. Since which year you keep records of stored POPs?
5. The names of the chemicals you store in the warehouse
6. Do you or have you used organochlorine pesticide?
7. Do you use DDT, endrin, toxaphene, aldrin, dieldrin, lindane, endosulfan, and other?
If you have used them, note until when or if you use them now, note in what quantities (applies to both previous and current use)

Questionnaires to Agricultural pharmacies (special focus on ones operated prior to 2006)

1. Status of work: yes/ no
2. Do you keep records of pesticides placed on the market. Since when?
3. Do you sell organochlorine pesticides? Did you sell them before?
4. DDT, endrin, toxaphene, aldrin, dieldrin, lindane, endosulfan (put all of the Stockholm Convention)
5. If you are selling or have sold them before, until when and in what quantities?
6. Are you familiar with the prohibition of the use and sale of pesticides that are inunsold stocks?

Questionnaires to the DDD service

1. How do you purchase the chemicals which you use for DDD purposes (do you import it yourself or you buy from an authorized dealer)?
2. Do you keep records since when and which products you use?
3. Do you use mixtures containing organochlorine pesticides (DDT, endrin, toxaphene, aldrin, dieldrin, lindane, endosulfan, and other?)
4. If you are using them now or have used them before, until when and in what quantities?
5. Do you have any of these preparations in a warehouse and if you have how much
6. What do you do with unused products after their expiry date or after the official prohibition of their use?

Questionnaires to Directorate for Emergency Situations

1. Do you have a record of flooded zones in the territory of Montenegro, and since when?

2. Do you have data on the structure of buildings damaged in the fire, such as storage of hazardous chemicals, pesticides and etc.?

PCB INVENTORY

In order to assess the situation in the field of PCB, it is necessary to undertake the following activities:

- a) From the Administration for Inspection Affairs - Department for Environmental inspection, request all the data about plants that were subject to inspection supervision in terms of PCB
- b) From the Administration for Inspection Affairs - Department for Environmental inspection, request all the data on implementation of measures under the decisions pertaining to the determination of the type of equipment for which it is not known whether it contains PCBs.
- c) Make a list of old and existing plants and compare it with the data obtained since environmental inspections.
- d) For installations which are not on the list of the performed inspections by the Ecological Inspectorate obtain information on the equipment and waste containing PCBs.
- e) With regard to the periods since the previous National Implementation Plan to date, inquire about the changes in certain locations where PCB stocks were identified, obtain information on the equipment that was installed at the construction sites.
- f) Request "Hemosan" Ltd. Bar to look for information on the amounts of collected equipment and waste containing PCBs, the type of waste and its origin (from where was it taken from).
- g) Collect data about other equipment that is suspected to contain PCBs in a concentration greater than allowed.
- h) Request the Coordinator of "National Project for decontamination and removal of PCBs from Montenegro" to look for information about the plants covered by the project, amounts and types of equipment and waste containing PCBs, as well as information on the planned activities under the project.
- i) After the data collection, format the information to be integrated in the updating of the National Implementation Plan and the Action Plan.

Un POPs INVENTORY

The Working Group is familiar with the new Toolkit – Standardized toolkit for Identification and Quantification of Dioxins and Furan Releases that should be used to revise the existence of the UnPOPs. There is a possibility that the Government has not updated any data since 2011, but the inter-institutional cooperation can facilitate access to data and collect updated information on the UnPOPs.

PBDES AND PFOS INVENTORY

The Working Group will use the following guidelines to guide their work:

1. Draft guidance for the inventory of polybrominated diphenyl ethers (PBDEs) listed under the Stockholm Convention on Persistent Organic Pollutants
2. List of comments and responses on the draft guidance for the inventory of PFOS and related chemicals listed under the Stockholm Convention
3. Draft revised guidance for the inventory of perfluorooctane sulfonic acid (PFOS) and related chemicals listed under the Stockholm Convention (31 March 2014)
4. Guidance for the control of the import and export of POPs

The information obtained on PFOS and PBDEs in the inventory shall include the following:

- Past and current uses/production of PFOS and PBDEs at the national level;
- Presence of products and articles containing PFOS and PBDEs on the consumer market;
- Flows into a country of products and articles containing PFOS and PBDEs;
- Presence of products and articles containing PFOS and PBDEs in the recycling streams;
- Disposal practices for products and articles containing PFOS and PBDEs when they become wastes;
- Any chemical stockpiles;
- Potential contaminated sites.

When establishing the inventory of PFOS and PBDEs, firstly it is necessary to identify resources and technical capacities necessary to further improve the accuracy of the inventory. The Working Group concluded that it is necessary to have continuous communication with the inspectors, with the Customs Administration and the Directorate-General and Internal Affairs in the Ministry of Interior. Experience from Serbia shows that from these institutions most of the data can be acquired. However, firstly, it will be necessary to organize regular meetings with all the institutions to provide general information about the POPs to those that did not have their representatives in the introductory workshop. Further on, all institutions will be given a questionnaire to fill out.

The first issue to consider in developing a national inventory is to define the scope of the inventory and target the national relevant sectors for PFOS and PBDEs. Cooperation with the relevant authority in charge of manufacturers of consumer products, suppliers, retailers and the customs service, as well as other relevant authorities and organizations is the most important.

The second step is identifying key stakeholders:

Uses	Stakeholders
Electrical and electronic equipment (EEE) and waste and electrical and electronic equipment (WEEE)	<ul style="list-style-type: none"> - Ministry of environment and ministry of industry; - Ministry responsible for waste management ; - NIP coordinator and steering committee; - Basel Convention focal point (& stakeholders in Basel activities on WEEE); - Importers and exporters of electronics; - Retailers of electronics and second-hand electronics; - Recyclers of WEEE; waste management experts; - Recyclers and users of polymers from WEEE; - NGOs working on WEEE; NGOs working on POPs ; - Other relevant stakeholders in the country.
Transportation and end-of-life vehicles	<ul style="list-style-type: none"> - Ministry of transport or other ministry responsible for transport sector; - Ministry responsible for waste management; - Association of importers and exporters of cars and other vehicles; - Retailers of vehicles (in particular, second-hand vehicles); - Association and/or main stakeholders of scrap recycling; - Association and/or main stakeholders of polymer recycling; - University groups working on material flows or transport issues; - NGOs working on transport; NGOs working on POPs; - Other relevant stakeholders in the country.
Other uses: Furniture Textiles Mattresses Construction materials	<ul style="list-style-type: none"> - Ministry of environment and ministry of industry; - Ministry responsible for waste management ; - NIP coordinator and steering committee; - Importers and exporters of furniture, textiles, mattresses, and construction materials; - Retailers of furniture, mattresses and textiles and related second-hand articles; - Recyclers of polyurethane or other sectors (e.g. textiles, polymers in building materials, rubber)Montreal Protocol focal point; - Other relevant stakeholder in the country.

Uses	Stakeholders
Contaminated sites	<ul style="list-style-type: none"> - Consumers; - Producers; - Importers and distributors; - Manufacturers; - Fabricators; - Engineering offices specializing in contaminated sites; - University or research institute working on contaminated sites; - Community-based organizations (CBOs) and NGOs; - Organized labor and trade unions; - Government organizations.

General tools that will be used to identify and contact stakeholders include:

- Telephone interviews;
- Email/Web-based information sourcing;
- Face-to-face interviews;
- National registers.

In accordance with the activities of stakeholders, separate meetings will be organized (depending on whether they are dealing with electronics, transport, furniture, textiles, mattresses and construction materials, and waste categories and management). The main focus of the inventory will be electrical and electronic equipment and their use in the transport sector.

The next step is to choose appropriate methodologies for data collection, using a three-tiered approach:

- Initial assessment
- Preliminary inventory
- In-depth inventory

The Working Group will follow the instructions of the provided guidelines and experiences from the neighbouring countries. Historically and economically the neighbouring countries (Serbia, Bosnia and Herzegovina) often have faced the same issues and are likely to overcome the presented obstacles in a similar way. This is particularly important since both Serbia and Bosnia and Herzegovina have already updated their National Implementation Plans.

LIST OF ANNEXES

Annex 1 –Invitation to the Kick-Off Meeting

Annex 2 –List of participants

Annex 3 –Presentations

Annex4 – Photo documentation of the Kick-Off Meetingand Inception Workshop

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